



EAST BAY MUNICIPAL UTILITY DISTRICT

DATE: April 16, 2026

MEMO TO: Board of Directors

THROUGH: Clifford C. Chan, General Manager 

FROM: David A. Briggs, Director of Operations and Maintenance 

SUBJECT: Follow-up Regulatory Compliance Semi-Annual Report

SUMMARY

In response to a request from the Planning Committee at its March 10, 2026 meeting, this memorandum provides additional information on the categories that fall under the regulatory compliance umbrella and reporting agencies, data on groups with higher injury rates, and the number of OSHA violations over the past five years.

DISCUSSION

Regulatory compliance is primarily managed by the District's Regulatory Compliance Office (RCO) which includes environmental-related permitting, workplace health and safety, and emergency preparedness.

RCO ensures compliance for daily District operations with numerous local, state and federal regulatory agencies including local air quality districts (Bay Area, San Joaquin, Amador, and Calaveras), two Regional Water Quality Control Boards, U.S. Environmental Protection Agency, California Environmental Protection Agency, Department of Fish and Wildlife, County Environmental Health Departments, Department of Toxic Substances Control, Cal/OSHA, National Fire Protection Association, Department of Transportation, Centers for Disease Control, and others.

The District's Drinking Water permit is managed by the Office of Water Quality. Other groups manage compliance for dam safety, water rights, and administrative functions such as human relations and finance/accounting.

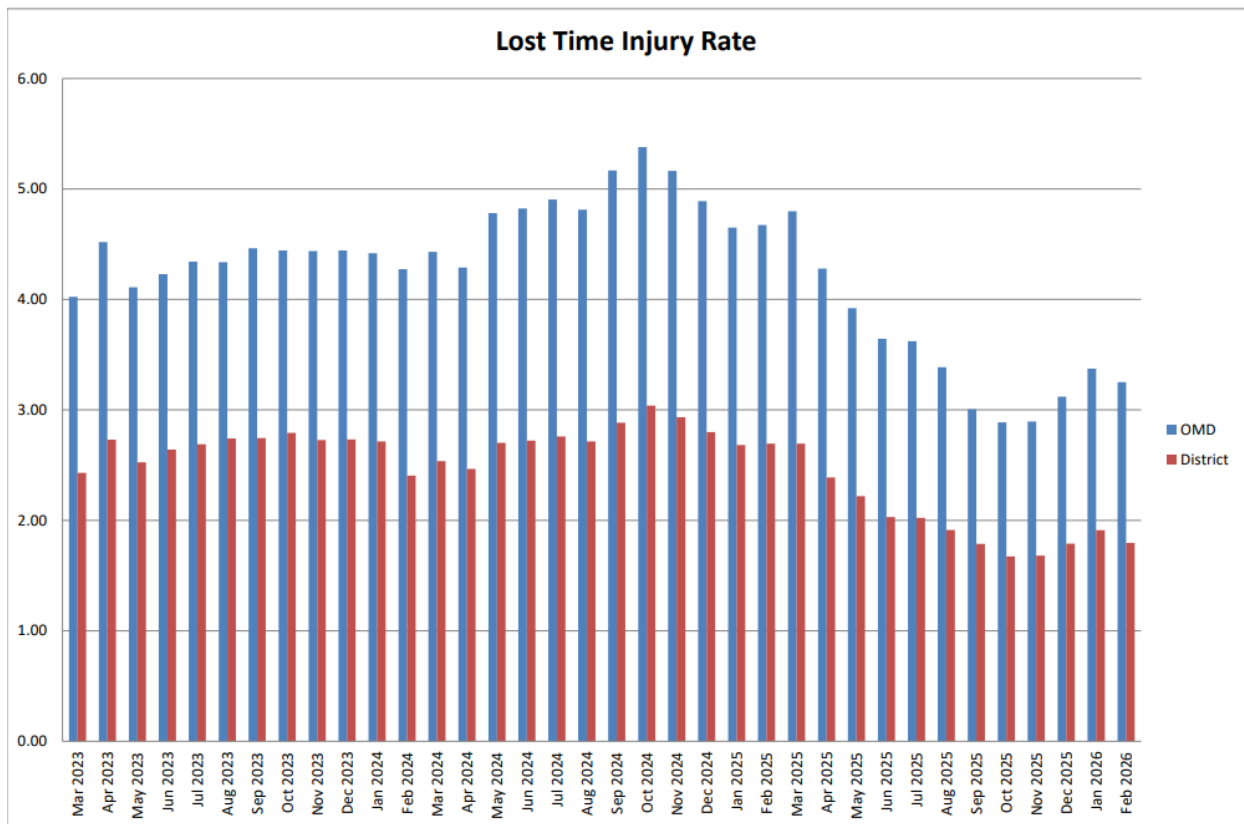
Lost Time Injury Rate

Information was requested on the calculation of Lost Time Injury Rate (LTIR). The LTIR is a standard OSHA metric that calculates the number of incidents that result in time away from work. A lost time incident refers to incidents that result in an employee's inability to work for any period due to a work-related injury or illness using the following formula:

$$\text{LTIR} = \frac{\text{Number of lost time cases}}{\text{Total hours worked by all employees}} \times 200,000 \text{ hours}$$

Prior to adjusting the LTIR for paid leave, 100 employees typically work about 200,000 hours per year. The resulting unitless number represents the number of lost time incidents expected in a year per 100 employees regardless of time missed or incident severity.

The Operations and Maintenance Department (OMD) staff are primarily involved in construction and field work. This department reports the largest share of the District’s lost time injuries. Below is the LTIR for the District and OMD for the past three years.



In the past 12 months, OMD has experienced a total of 27 lost time injuries. Twelve of those lost time injuries involved plumbing crews and eight involved meter reader/mechanics (MRM). Workplace health and safety staff are working with both work groups to reduce injuries. An industrial ergonomist was hired in June 2025 to conduct a risk assessment of MRM work tasks. Several recommendations are being implemented or evaluated for feasibility. Phase 2 of the assessment will include updating the *Ergonomics Handbook* that was created in 2011. Some of the recommendations include piloting alternative tools that minimize contact stress and are

lighter and/or easier to handle and store, reviewing and updating the MRM training manual, and ensuring good habits are modeled during new employee training.

An Industrial Athlete Program will soon be piloted for MRM staff that includes personal ergonomic risk assessments including a three-minute warm up program, body mechanics coaching, and ergonomics training.

The majority of plumbing crew injuries are related to soft tissue damage (sprains and strains). Mitigation includes use of mechanical tools for lifting and the turning of gate valves, proper exiting of large vehicles to ensure balance is maintained while stepping down, and a recently developed Hand Tool Safety Program which includes reviewing and training on the manufacturer's instruction manual and demonstration of appropriate jobsite set up for proper tool use.

Past Cal/OSHA Violations

Information was requested on the history of OSHA violations over the past five years. The District may be inspected for several reasons including a complaint by an employee or member of the public, a post-accident investigation, or an industry targeted inspection. Since 2020, the District has been cited on three separate occasions related to respirator fit-testing and medical clearance, potential exposure to hazardous substances, and improper tool usage following an injury.

CCC:DAB:sd

This page is intentionally left blank.